

03103903

STATE IDENTIFICATION NUMBER
(If Applicable)

EPA Region 5 Records Ctr.



323210

ILD091766410

EPA IDENTIFICATION NUMB.

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility StandardsI. General Information:

- (A) Facility Name: Cosden Oil + Chemical Company
(B) Street: 142nd + Paxton
(C) City: Calumet City (D) State: IL (E) Zip Code: 60409
(F) Phone: 312-862-6140 (G) County: Cook
(H) Operator: Cosden Oil + Chemical Company
(I) Street: 142nd + Paxton
(J) City: Calumet City (K) State: IL (L) Zip Code 60409
(M) Phone: 312-862-6140 (N) County: COOK
(O) Owner: Cosden Oil + Chemical Company
(P) Street: PO Box 2159
(Q) City: Dallas (R) State: TX (S) Zip Code: _____
(T) Phone: 214-750-2400 (U) County: _____
(V) Date of Inspection: 3-26-82 (W) Time of Inspection (From) 12:45pm (To) 3:00pm
(X) Weather Conditions: 40° cloudy

(pg 11-18, 21, 23 not applicable)

(Y)	Person(s) Interviewed	Title	Telephone
	<u>G. Hardin</u>	<u>Office Manager</u>	<u>312-862-6140</u>
	<u>R. Grimes</u>	<u>Plant Manager</u>	<u>312-862-6140</u>
(Z)	Inspection Participants	Agency/Title	Telephone
	<u>R. Grimes</u>	<u>Plant Manager</u>	<u>312-862-6140</u>
	<u>G. Hardin</u>	<u>Office Manager</u>	<u>312-862-6140</u>
	<u>B. Eleder</u>	<u>EPA/EP5</u>	<u>312-345-9780</u>
(AA)	Preparer Information		
	Name <u>B. Eleder</u>	Agency/Title <u>EPA/EP5</u>	Telephone <u>312-345-9780</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <p><input checked="" type="checkbox"/> A. Storage and/or Treatment</p> <p><input checked="" type="checkbox"/> 1. Containers (I)</p> <p>2. Tanks (J)</p> <p>3. Surface Impoundments (K)</p> <p>4. Waste Piles (L)</p> <p><input type="checkbox"/> B. Land Treatment (M)</p> <p><input type="checkbox"/> C. Landfills (N)</p> | <p><input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P)</p> <p><input type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q)</p> |
|---|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u>—</u>	<u>—</u>	<u>X</u>	<u>none</u>
2. Facility expansion?	<u>—</u>	<u>—</u>	<u>X</u>	<u>none</u>
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	<u>—</u>	<u>—</u>	<u>- outside lab does all sampling + analysis work</u> <u>- re-sampling done if +</u> <u>when change process or product</u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>X</u>	<u>—</u>	<u>—</u>	<u>- training manual has section on waste plan</u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>X</u>	<u>—</u>	<u>—</u>	<u>TV monitor at entrance</u> <u>24 hr. guard</u>
2. Artificial or natural barrier around facility?	<u>X</u>	<u>—</u>	<u>—</u>	<u>river on N</u> <u>fence on S, E, W</u>
3. Controlled entry?	<u>X</u>	<u>—</u>	<u>—</u>	<u>guard at gate</u>
4. Danger sign(s) at entrance?	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
2. Records of operator error?	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
3. Records of discharges?	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>

*Not Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>X</u>	---	---	-----
5. Safety, emergency equipment?	<u>X</u>	---	---	<u>Weekly + monthly + yearly.</u>
6. Security devices?	<u>X</u>	---	---	-----
7. Operating and structural devices?	<u>X</u>	---	---	-----
8. Inspection log?	<u>X</u>	---	---	<u>1 - drum storage + drums done weekly</u>
 (E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<u>X</u>	---	---	<u>training session held for all</u>
2. Job descriptions?	<u>X</u>	---	---	<u>employees - signed form</u>
3. Description of training?	<u>X</u>	---	---	<u>certifies each employee that</u>
4. Records of training?	<u>X</u>	---	---	<u>attended training manual</u>
5. Have facility personnel received required training by 5-19-81?	<u>X</u>	---	---	<u>given to each employee -</u>
6. Do new personnel receive required training within six months?	<u>X</u>	---	---	<u>yearly reviews held</u>
 (F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<u>X</u>	---	---	-----
2. No smoking signs?	<u>X</u>	---	---	-----
3. Separation and protection from ignition sources?	<u>X</u>	---	---	-----

⊗ AIG Risk Mgmt, Inc. does yearly safety insp. - last done in Feb '82
Grinnell does Yrly inspections of fire equipment

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

The Cosden Oil and Chemical Company manufactures polymer resins. One hazardous ^{waste} is generated from this process - polymerized styrene. The facility has labeled it as a flammable liquid although it will set up to form a solid over a period of time. It is regulated under Illinois Special Waste Permit No. 802555.

There are two points of generation - from weep buckets located under all sample points and polymer pumps, and from changing the filters on the units.

All the waste is drummed in 55 gallon drums. At the time of the inspection, 38 drums were observed, all of which were closed, in good condition, and correctly labeled. Five of the drums were inside overpack drums. All were resting on wooden pallets. The concrete storage area was diked and had a sump located in one corner. Fire and safety equipment were observed next to the storage area. There were warning signs posted.

A second hazardous waste has been generated in the past - styrene monomer, inhibited acrylonitrile, also a flammable liquid. This was regulated under Illinois Special Waste Permit No. 810411, which expired this month. It was last generated and removed from the facility in early 1981. The process has since changed so that this waste is no longer generated.

Due to a misunderstanding of the Regulations concerning storage (only) facilities, their Legal Dept. in Dallas did not direct them to have a Closure Plan written up. After pointing out the section of 40CFR requiring it, a telegraph message was sent (which this inspector saw) directing the facility manager to write one up. It is to be mailed to this office once completed.

No other possible violations of the Regulations were observed. .

LPC REFERENCE SHEET (SAME FACILITY)

Facility Number: 0310320003 County: COOK

Facility Name: FINA OIL + CHEMICAL CO

USEPA Number: IL D091766410

File Category: RCRA CLOSURE

FOR ADDITIONAL INFORMATION SEE FILE CATEGORY: *RCRA PERMIT*

Date _____

Brief Description of Documents

11-30-82

PART A WITHDRAWAL LETTER

WITH ATTACHMENTS

9-27-83

LETTER TO KARL J. KLEPITSCH

FROM JERRY G. JENKINS

11-10-83

LETTER TO KARL J. KLEPITSCH

FROM TED M. NARN JR.